



John Bloor  
215-988-2736 Direct  
215-988-2757 Fax  
john.bloor@dbr.com

Law Offices  
One Logan Square, Ste. 2000  
Philadelphia, PA  
19103-6996  
(215) 988-2700 phone  
(215) 988-2757 fax  
[www.drinkerbiddle.com](http://www.drinkerbiddle.com)

CALIFORNIA  
DELAWARE  
ILLINOIS  
NEW JERSEY  
NEW YORK  
PENNSYLVANIA  
WASHINGTON D.C.  
WISCONSIN

November 6, 2015

**VIA ECF**

The Honorable Gary R. Brown, U.S. Magistrate Judge  
Courtroom 840  
100 Federal Plaza  
P.O. Box 9014  
Central Islip, NY 11722-9014

**Re: U.S. Bank National Ass'n v. Sun Life Assurance Company of Canada,  
Case No. 14-CV04703-SJF-GRB**

Dear Judge Brown:

I write on behalf of Defendant Sun Life Assurance Company of Canada ("Sun Life") to respectfully request an adjournment of the close of discovery date listed in Judge Feuerstein's May 26, 2015 order. [Dkt. No. 31.] Sun Life has conferred with counsel for Plaintiff in connection with this request, and Plaintiff takes no position on the relief requested. No previous adjournments have been requested.

In her May 26, 2015 order, Judge Feuerstein set a deadline of November 23, 2015 for all discovery to be completed, a deadline of January 26, 2016 for dispositive motions, and a pretrial conference for March 24, 2016. While the parties are diligently engaged in discovery, Sun Life believes that a brief extension of the discovery deadline is necessary.

Sun Life proposes that the discovery deadline be extended to January 15, 2016. This brief extension will allow the final discovery tasks to be accomplished in a more efficient manner, while not disturbing the other dates contained in the May 26, 2015 order. Additionally, since the entry of the May 26, 2015 order, both parties now contemplate using expert witnesses. A brief extension of the discovery deadline will allow the parties to exchange expert reports based on the fullest possible factual record.

Respectfully submitted,



John Bloor

John Bloor

JMB  
cc: Counsel for Plaintiff (via ECF)